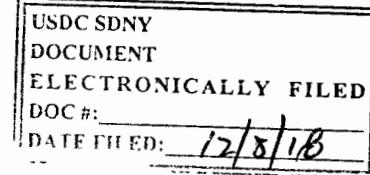


Cox Padmore Skolnik & Shakarchy LLP

Attorneys at Law

Ralph N. Gaboury, Esq.  
Of Counsel  
Also admitted in  
Massachusetts and Rhode Island



December 3, 2018

Via ECF Filing  
Courtesy copy by Fax to (212) 805-7986

Hon. Paul G. Gardephe, U.S.D.J.  
United States District Court  
for the Southern District of New York  
40 Foley Square, Room 2204  
New York, NY 10007

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

Paul G. Gardephe  
Paul G. Gardephe, U.S.D.J.

Dated: Dec. 4, 2018

**Re: Pearson Education, Inc., et al v. Doe 1 d/b/a Anything You Can  
Imagine, et al., (SDNY 1:18-cv-7380-PGG)**

**Defendant Krista Hale (sued herein as Doe 2 Momma's Media 'N More)  
Consented Request for Extension of Time to Answer or Respond to the  
Complaint through and including January 4, 2019**

Dear Judge Gardephe:

This firm represents defendant Krista Hale, the sole proprietor of the Amazon online storefront named in the above-referenced proceeding as anonymous defendant "Doe 2 Momma's Media 'N More" ("Defendant Hale"). For good cause, Defendant Hale respectfully requests that her time to answer or respond to the Complaint in this proceeding be extended through and including January 4, 2019.

On November 2, 2018, **with the consent of Plaintiffs**, Ms. Hale timely submitted a request to extend her time to respond to the Complaint from November 5, 2018, through and including December 5, 2018, for good cause. **However, a review of the Court's docket indicates that the Court has not yet ruled on Ms. Hale's prior request (ECF No. 84).**

Ms. Hale now submits her third request for an extension of time to respond to the Complaint for good cause and **with the consent of Plaintiffs**.

As good cause for this request, Plaintiffs and Ms. Hale have exchanged a settlement proposal and counterproposal, and continue to engage in settlement discussions regarding those proposals. Ms. Hale respectfully contends that there is good cause for this request because the

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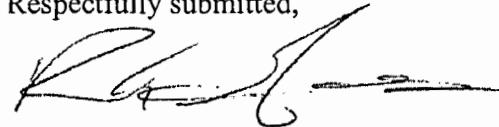
Hackensack  
201-489-0050

Hon. Paul G. Gardephe, U.S.D.J.  
United States District Court for the Southern District of New York  
December 3, 2018  
Page 2

Cox Padmore Skolnik  
& Shakarchy LLP  
Attorneys at Law

parties ongoing discussions may result in settlement of this matter as to Ms. Hale, eliminating the need for Ms. Hale to answer or move with respect to the Complaint.

Respectfully submitted,



Ralph N. Gaboury

cc: Kerry M. Mustico (counsel for plaintiffs) (by ECF Filing)  
Matthew I. Fleischman (counsel for plaintiffs) (by ECF Filing)